

Section XII

Responsibility 10a: Establishing
Licensing Procedures and Standards

XII. Establishing Licensing Procedures and Standards for Instructional Staff

“Establishing licensing procedures and standards for instructional staff for all eligible District schools including public, public charter, private, and District of Columbia public institutions for post secondary education” State Education Office Establishment Act of 2000, Section 6(b)(10)

A. Background

1. Introduction

Licensing procedures and standards for instructional staff play an important role in determining selection of teachers, administrators, and service providers in the District of Columbia. The selection of instructional staff is a critical component of quality education, and establishing these standards determines the qualifications by which candidates are measured. Presently, the District of Columbia’s Board of Education is responsible for establishing licensing procedures and standards for instructional staff of pre-K through 12, upon recommendation made by the DCPS Educational Credentialing and Standards Branch. As stated in Section XI, certification and licensure of instructional staff for grades pre-K–12 is only required by the District of Columbia Public Schools. Discussion of the legislative exemption for public charter and private schools is explained in the legislative section.

The enabling legislation required study of establishing licensing procedures and standards for instructional staff for all eligible District schools, including public, public charter, private, and District of Columbia public institutions for post-secondary education. The information presented in this section of the report will, for the reader, be very similar to material presented in Section XI. This is because the two functions are closely related and are best conducted together. Teacher, administrator, and service provider certification is, in fact, the principal requirement for teacher licensure.

This section presents much of the same information presented in Section XI. The concluding parts of Section XII are identical to the corresponding parts of Section XI, except that the options and recommendation in Section XI are specific to certification and teacher education program accreditation, and the options and recommendation in Section XII are specific to instructional licensure.

Interviews with representatives of the University of the District of Columbia ascertained licensing procedures and standards do not pertain to instructional staff at the post-secondary level. Through the SEO’s research and review of the legislative intent, it has been determined that the licensing of post-secondary institutions is a critical issue to study. The licensure and regulation of private, post-secondary degree-granting and non-degree schools currently conducted by the Education Licensure Commission is discussed in Section XIII.

2. Legislation

District of Columbia Public Schools

Pursuant to the authority set forth in 31-101 et seq. of the D.C. Code, the Board of Education establishes certification and licensing requirements for administrators, instructional staff, and service providers, as well as accreditation requirements for teacher education programs in the District of Columbia. The Board of Education policies and the District of Columbia Public Schools Superintendent directives associated with teacher certification, licensing, and teacher program accreditation are found in Title 5 of the District of Columbia Municipal Regulations (5 DCMR). Chapters 10, 13, and 16 of Title 5 pertain to certification, licensing, and teacher education program accreditation. Chapter 10 outlines general personnel policy, Chapter 13 describes conditions of employment, and Chapter 16 presents the license requirements for teachers, administrators, and other professional categories requiring licensure. While Chapter 16 is titled "license requirements," these criteria are in essence the certification requirements one must meet in order to apply for a license in the various categories of instruction, administration, and educational support. Please see Appendix K for an outline of the licensure categories.

On September 22, 1993, the Board of Education amended Chapter 16 of the Board Rules to revise the provisions for teacher licensure. Since 1993, notices of final rule-making passed by the District of Columbia Emergency Transitional Education Board of Trustees have amended, and added, certain sections of Chapters 10, 13, and 16. Of note are the following:

- establishment of the administrative services credential (amends 5 DCMR §1001.7, 1667.1, 1667.4, and 1667.10; Superintendent Directive 315.7);
- establishment of certification requirements for teachers of Montessori education grades 1-6 (amends 5 DCMR §1605.1; adds §1605.2);
- establishment of Praxis Series: Professional Assessments for Beginning Teachers requirement (amends 5 DCMR §1001.12 – 1001.17; Superintendent Directive 652.8);
- establishment of provisional license (amends 5 DCMR §1001.13 and 1001.14; Superintendent Directive 315.6); and
- enhanced reciprocity between the District of Columbia and other states regarding teacher licensure (amends 5 DCMR § 1003).

Public Charter Schools

In the District of Columbia, public charter school staff are exempt from certification and licensing requirements, as per Section 2204 (c) (3) of the District of Columbia School Reform Act of 1995 (DC Code § 31 – 2853.41), which states that a public charter school

“shall exercise exclusive control over its expenditures, administration, personnel, and instructional methods....”

Section 2202 of the District of Columbia School Reform Act of 1995 outlines the required contents of petitions to establish public charter schools. Section 2202 (12) requires “an explanation of the qualifications that will be required of employees of the proposed school.” Also relevant is § 2202 (16), which requires “an assurance the proposed school will seek, obtain, and maintain accreditation...”

Private Schools and Early Childhood Development Centers

Private schools include independent schools and schools with religious affiliation. Early childhood development centers are non-DCPS early education sites. The legislation exempting private schools from the certification requirements for teacher, administrators and service providers is found in rule-making action amending 5 DCMR, Chapter 21 (§ 2100.2 and 2100.3). Promulgation of this rule was required due to the enactment of D.C. Law 8-247, the District of Columbia Compulsory School Attendance Amendment Act of 1990. This rule-making makes reference also to early childhood development centers in terms of certification, licensing, and accreditation requirements.

Essentially, those educational institutions not affiliated with DCPS must provide educational services acceptable to the Board of Education, and the Superintendent of Schools shall require such institutions to present satisfactory evidence that various aspects of their instruction are acceptable to the Board. In reference to staff qualifications, item § 2100.2.c. states, “Qualifications of staff: training and educational requirements for teaching and supervisory staff must be acceptable to the Board of Education, although a District of Columbia teaching certificate is not required.”

Also relevant to teacher qualifications is 5 DCMR § 2100.3 requiring, . . .

“Proof that the institution is currently accredited by, or undergoing the accreditation process.”

Pertinent legislation in the District of Columbia School Reform Act related to public charter schools is found in Section 2202 (17): “In the case that the proposed school’s educational program includes pre-school or pre-kindergarten, an assurance the proposed school will be licensed as a child development center by the District of Columbia Government not later than the first date on which such program commences” is required.

3. History

The District of Columbia’s Organic Act of 1906 created the Board of Examiners (later called the Board of Education) at the state level to implement all certification functions and to approve teacher education programs. The office responsible for the teacher certification and licensing function (currently known as the Educational Credentialing and Standards Branch) has always been housed in the District of Columbia Public

Schools. In the 1980s, the branch fell under the jurisdiction of the Office of Special Services and State Affairs. In 1989 and into the early 1990s, the office became the Division of Teacher Services. DCPS reorganized in 1992, and placed the branch under the Office of State Education Agency/Local Education Agency Operations and Special Programs.

The cover page for 5 DCMR Chapter 16: License Requirements, dated 1993, indicates authorship by the Teacher Education and Certification Branch in the Division of State Services within D.C. Public Schools. For a period between 1995 and 1996, the branch reported to the Office of Educational Accountability. At some point in 1997, DCPS re-located the branch in the Office of Human Resources, where it remains.

4. Current Status

Board of Education

The District of Columbia's Board of Education is responsible for reviewing policy recommendations set forth by the DCPS Educational Credentialing and Standards Branch regarding licensing procedures and standards for teachers, administrators, and service providers. If approved, these recommendations are established as rules in the 5 DCMR chapters pertaining to licensure.

Educational Credentialing and Standards Branch

The District of Columbia has a single licensing office for teachers, administrators, and service providers. This office is the Educational Credentialing and Standards Branch in the Office of Human Resources in the District of Columbia Public Schools. This branch prescribes the following for licensure application in the District of Columbia:

- certification application form;
- application fee (\$30.00);
- scores from the Praxis I and Praxis II;
- official transcript;
- verification of previous full-time teaching experience;
- copy of out-of-state license(s), if applicable; and
- verification of previous non-teaching, trade, or technical experience, if applying for such positions.

(See Appendix K for a copy of the licensure/certification application with details regarding procedures and the Praxis exams)

Certification analysts then review the application to determine whether the applicant meets the licensing standards. A District of Columbia license is issued once the standards have been met. Description of several licensure options can be referenced on page 2 of the licensing application in Appendix K. They are outlined as follows: teacher approved program, interstate reciprocity, transcript analysis, and experiential learning.

The District of Columbia has a single certification office for teachers, administrators, and service providers. This office is the Educational Credentialing and Standards Branch in the Office of Human Resources in the District of Columbia Public Schools. All individuals interested in seeking a license must fill out an application packet that includes a certification section. For teachers, administrators, and service providers, this certification section is reviewed to determine whether the candidate meets the certification requirements as per 5 DCMR Chapter 16 – the general criteria for teaching, and the criteria specific to the desired subject area.

The following mission, function, and budget statement is based on the information submitted by the Educational Credentialing and Standards Branch in their FY 2001 Budget submittal (authored in FY 2000). Because this branch conducts certification, licensing, and accreditation of teacher education programs activities, this information shall be presented in full in this section, even though it was stated also in Section XI. Please note that at times the Educational Credentialing and Standards Branch uses the terms licensure and credentialing in lieu of certification.

Mission: The Educational Credentialing and Standards Branch is a state education agency responsible for establishing and maintaining the process and procedures for the licensure of educational personnel and accrediting the teacher training programs at post-secondary institutions in the District of Columbia.

Connection to DCPS Mission: In accordance with Board policies (DCMR, Chapters 10,13,16) and to ensure a highly qualified work force, all teachers and service providers employed by the District of Columbia Public Schools are required to maintain a valid teaching license in the area of instruction and/or service delivery. Service providers include school counselors, school pathologists, school social workers, school librarians, speech language pathologists, and others outlined in DCMR Chapter 16, Licensing Requirements. Initial and continuing licensure is intended to ensure that the work force responsible for providing direct services to children has completed the appropriate assessments and academic training for the profession.

State-level (SEA) Activities:

The Educational Credentialing and Standards Branch has two major state functions: state licensure (credentials) and teacher education.

Educational credentialing and licensure: Educational credentialing is a licensure process whereby the state officially verifies and certifies that an applicant meets the stipulated

educational and experiential requirements for teaching a specified subject or course of study. Specifically, it involves a set of sanctioned standards and the application of the standards in determining whether applicants meet minimum competencies for the issuance of a teaching certificate for employment within and outside (reciprocity) the District of Columbia. The population served includes DCPS teachers, administrators, and appropriate service providers. General activities supporting this function are indicated as follows:

- reviewing state standards for teacher, administrator, and service provider licensure and making recommendations to the Board of Education regarding revisions;
- monitoring compliance with the Rules of the Board of Education pertaining to re-certification;
- administering the certification/licensure program servicing all educational personnel in D.C. public, public charter, and private schools seeking such status in the jurisdiction of the District of Columbia (processing a minimum of 8,000 application requests per year) which includes evaluating and processing applications, development of application procedures, etc.;
- preparing the State Licensure Report identifying the licensure status of approximately 5300 teachers/service providers employed by D.C. Public Schools;
- monitoring an alternative certification program for non-education majors for the teaching profession;
- monitoring the teacher-testing program for persons seeking an initial teaching license (Praxis exams);
- coordinating a program for teachers interested in obtaining National Board Certification; and
- certifying external training programs for renewal of professional certificates.

Teacher education: Teacher education focuses on those activities that ensure colleges and universities have instituted teacher preparation programs in accordance with state standards. The goal is to produce highly qualified teachers for school districts. These programs must consist of rigorous standards of quality for determining the eligibility of graduates for state teacher licensing. Emerging national trends include accountability measures for teacher education institutions based on the success of their graduates.

The District of Columbia evaluates the teacher preparation programs at seven area colleges and universities: American University, Catholic University, Gallaudet University, George Washington University, Howard University, Trinity College, and the University of the District of Columbia. State-level activities to support this function include the following:

- conducting quarterly meetings with the deans of the teacher education programs at area colleges and universities to share information that relates to their programs and initiatives implemented in the District of Columbia Public Schools;
- administering the Interstate Compact Agreement for interstate reciprocity;
- establishing state standards for program approval, which are reviewed and revised on a regular basis;
- evaluating the teacher education programs of the seven institutions of higher education in the District of Columbia;
- maintaining contact with other national accrediting organizations (i.e., NCATE, NASDTEC, and the Northeast Regional Laboratory);
- maintaining contact with other national organizations of teacher education (i.e., Association of Teacher Educators, American Association of Colleges for Teacher Education); and
- presenting workshops on the licensure process.

Local (LEA) Activities:

- Monitor the licensure status of educational personnel employed with the District of Columbia Public Schools.
- Conduct recruitment and retention efforts for DCPS. Such activities include recruitment fairs, counseling to staff regarding licensure requirement compliance, etc.
- Provide support and advice to principals and managers concerning staff personnel issues.

FY 2001 Staffing and Organization Chart: In the early 1990s the Educational Credentialing and Standards Branch had a staffing level of approximately 15. Three of these positions were assistant directors heading divisions of accreditation, teacher testing and policy, and certification. Today, the branch has nine staff to handle processing of applications for both DCPS and non-DCPS school sites, and management of alternative and national certification programs that did not exist in the early 1990s.

Since the newly added responsibilities have increased work flow, the office conducts a 12-hour business day in order to maintain a high level of customer service. Staffing is as follows:

<u>Position</u>	<u>Grade</u>
Director	ET 8 Step 9
LEA Educational Specialist (DCPS)	EG 12 Step 3
SEA Educational Specialist	EG 11 Step 5
Certification analyst	EG 11 Step 5
Certification analyst	EG 11 Step 6
Central Office Clerk	DS 5 Step 2
Receptionist	DS 5 Step 2
Certification Assistant	EG 7 Step 1
Secretary	EG 8 Step 2

The Director of the branch is the primary policy analyst crafting the certification, licensure, and teacher education program standards for recommendation to the Board of Education. In addition, the Director has the following administrative tasks: sustaining memberships in pertinent national associations to keep abreast of national trends in these areas, processing non-DCPS licensure applications with support from the SEA Educational Specialist, managing the information technology piece related to the function, and conducting the accreditation of teacher education programs with assistance from one of the support staff when conducting site visits required by this function.

The Educational Specialist and two Certification Analysts assigned to LEA duties serve a 5600-teacher body for DCPS secondary and elementary schools. Administrative tasks include processing licensure requests and evaluating credentials, as well as monitoring compliance with licensure standards. An example of the work load in the LEA arena is the actual 575 cases of non-compliance for which letters must be sent to the individuals whose license might need renewal, conversion from the provisional license, etc. Recruitment and retention activities are also an integral part of the LEA duties.

The SEA Educational Specialist position responsibilities include coordinating the development and implementation of revised standards for initial licensure and re-certification, coordinating the alternative certification program, coordinating the program approval (accreditation) process for D.C. colleges/universities, providing statistical reports and data analyses regarding the licensure process, conducting research evaluations and investigative analyses of best practices in teacher education, and evaluating new applications and requests from non-DCPS educational agencies.

Four support staff (secretary, receptionist, central office clerk, and certification assistant) provide technical assistance to the five aforementioned positions in the areas of certification, licensure, and teacher education program accreditation. The application process is primarily a paper process creating the need for the maintenance of paper files. Particularly notable is the data entry of certification/licensure status and actions into the branch's database, although, unfortunately, this system does not link to the People Soft system utilized by the Office of Human Resources. (While stakeholders commended the separation of certification actions from other personnel actions, maintenance of two systems requires additional data entry.)

The Educational Credentialing and Standards Branch requested the addition of the SEA educational specialist in their FY 2001 budget submittal. This position increased their staffing level from eight to nine FTEs for FY 2001.

Performance Data: Monthly reports are generated to indicate the number of initial requests (applications, written correspondence, test scores, transcripts) received in the office and the number of actions completed by staff. The statistical data tracks the time applications/licensure requests are received and the response time for completion. Results from the Licensure Receipt Form returned to the branch by clients are reviewed to determine better strategies for effective customer service. A reduction in the number of uncertified teachers (from 14% to 8%) resulted from staff-sponsored individualized meetings with DCPS teachers/service providers, visitations at local schools to provide information, and a coordination of appropriate educational programs at area colleges/universities and professional development programs in DCPS and the Washington Teachers Union.

When time permits, a report of certification/licensure status may be generated. Such a report provides DCPS with an overview of the status of their teaching, administrative, and service provider staff. The Educational Credentialing and Standards Branch recently (March 2001) completed this status report to find that approximately 1000 teachers were due for some type of licensure action by June 2001. Certain periods of the year may yield higher work load demand when preparing for summer school, the beginning of the school year, or when a site visit is due for one of the teacher education programs.

Budget Overview: See the Appendix for a copy of the FY 2001 budget submittal for the Educational Credentialing and Standards Branch at DCPS. The first page is the FY 2000 Personal Services report, with salaries and benefits totaling \$388,548. The second page outlines FY 2000 Personal and Other Than Personal Services (OTPS) -- \$20,860 -- for a grand total of \$409,408.

Not reflected in this budget submittal is the approximately \$81,500 of revenue collected by DCPS in licensure evaluation fees. These fees collected by the Educational Credentialing and Standards Branch are submitted to the DCPS central finance office. Requests can then be made by the branch for use of these funds for its activities pertaining to certification and licensure. For example, such a request might be made to finance advertising costs associated with a recruitment fair.

B. Description of Practices in Other States

Nationwide Developments

The National Association for State Directors of Teacher Education and Certification (NASDTEC) has had a major impact on the quality of individual state programs through the work of the Professional Preparation and Continuing Development Committee, and its predecessor, the NASDTEC Standards Committee. In recent years, the committee has

focused its attention on developing performance-based standards. Another important contributor to the development of quality standards is the National Council for Accreditation of Teacher Education (NCATE). Forty states, the District of Columbia, and the Commonwealth of Puerto Rico have entered into partnership agreements with NCATE designed to facilitate the coordination of joint site visits.

In addition to requiring candidates to complete approved programs, many states have requirements, such as a degree, minimum grade point averages, specific courses, testing, age, citizenship, etc. Each year, NASDTEC publishes a manual that includes basic information about certification requirements and policies that can be compared across states, territories, the Department of Defense, the Canadian provinces, and New Zealand. Information regarding specific subjects, such as background clearance and discipline of certificate holders, emerging trends, and interstate contracts can also be researched in their manual.

The Executive Director of NASDTEC and a representative of NCATE concur that all states and territories, with the exception of American Samoa and the District of Columbia, handle their certification, licensure, and teacher education program accreditation functions in their state departments of education. Approximately 14 states have now established independent professional standards boards and/or commissions:

California	Nevada
Georgia	North Dakota
Hawaii	Oklahoma
Indiana	Oregon
Iowa	Texas
Kentucky	West Virginia
Minnesota	Wyoming

With the exception of Wyoming, in all the states the governor appoints the members of these professional standards boards and/or commissions. Confirmation by the legislature is also required in some states. All of the boards/commissions have responsibility for setting standards for licenses/certificates. Three (Iowa, Nevada, and Wyoming) do not have authority to approve college and university teacher education programs. An additional, unspecified number of states have semi-autonomous state professional standards boards.

In recent years, many educators have attempted to make a distinction between certification and licensure based on the definitions used in other professional fields. They argue that states license and specialized boards certify in their respective fields. The National Board for Professional Teaching Standards (NBPTS) has accepted that distinction and is certifying experienced teachers who meet high and rigorous standards. Some states now issue licenses to candidates, while others continue to issue certificates.

Early Childhood Development: The emerging trend in the area of early childhood development, or education, is a certification/licensure standard for birth to Grade 3. In

the District of Columbia, there are distinct requirements for DCPS pre-K versus non-DCPS pre-K. The establishment of uniform requirements could apply to DCPS early education programs and the early childhood development sites regulated by the Office of Early Childhood Development with a closure of the existing salary gap.

Maryland

In the State of Maryland, the Division of Certification and Accreditation is located in the Maryland State Department of Education's Office of the Deputy Superintendent for Administration. The requirements for certification, licensure, and teacher education program accreditation are established at the state level. The Director of this office may approach the State Board of Education or the semi-autonomous State Professional Standards Board to begin the regulatory hearing process. If the issue is contentious, a conference committee between the two boards may initiate the regulatory process. The policy process can be extended by interaction between these two decision-making entities.

In addition to its policy role, Maryland's Division of Certification and Accreditation administers state-level operations associated with certification, licensure, and teacher education program accreditation. The Maryland State Department of Education (MSDE) reviews applications, collects fees, and issues licenses (certificates). It also has responsibility for renewals and suspension/revocation actions, oversight of the Praxis I and II assessment, and serves as the repository for records, as well as administering teacher education program accreditation.

At the local level, a county may set its own conditions of employment. For example, upon licensure by the State of Maryland, Montgomery County may review a candidate's qualifications according to county conditions, which may be more stringent than the state licensure requirements.

Maryland is in the process of modernizing their certification/licensure process, and this includes innovative technological approaches. In addition to an informative website regarding certification and licensure, an interactive site will allow teachers, administrators, and service providers to check on the status of their files, as well as receive electronic notices about license renewals, professional development activities, adding endorsements, etc. The website will have links with colleges and universities.

Virginia

In the State of Virginia, the Assistant Superintendent for Teacher Education and Licensure at the State Department of Education oversees two divisions handling each of these functions. Virginia has an advisory board consisting of nineteen members, providing broad representation on teacher education and licensure issues. The advisory board meets five times a year, and generally makes annual recommendations to the State Board of Education, with occasional presentations to the Board. The nine-member State Board of Education considers regulatory recommendations, while the teacher education

and licensure divisions support the advisory board through research and coordination of meetings.

Virginia does not employ certification analysts at the local level. The state-level licensure division has designated contacts at the local level who may evaluate credentials when teachers are hired. These credentials (the application) are then submitted with the application fee to the State Department of Education for processing and issuance of a license. Local contacts may verify renewal requirements in the same manner.

C. Statement of Options

Option One: The District of Columbia Board of Education and DCPS retain the authority and responsibility for establishing licensing procedures and standards for instructional staff for all eligible District schools, including public, public charter, private, and District of Columbia public institutions for post-secondary education. DCPS retains state-level licensing operations.

Discussion: The Educational Credentialing and Standards Branch at DCPS continues to make recommendations to the Board of Education regarding licensing procedures and standards for teachers, administrators, and service providers, and the Board of Education reviews the recommendations for rule-making decisions. The Educational Credentialing and Standards Branch continues to administer state-level licensing operations.

Advantage:

- Since the legislative requirements for licensing pertain to instructional staff employed by DCPS, this option allows the Board of Education and DCPS to continue to establish licensing procedures and standards.

Disadvantages:

- Service time is longer for those instructional staff applying from non-DCPS settings than for those from DCPS.
- Due to the Board of Education and DCPS's focus on LEA aspects of the function (particularly the licensure status of DCPS teachers), SEA aspects have been neglected. Such state functions include revising the state standards for licensure, revising Board policies, updating Superintendent directives, and completing state reports in a timely manner.

Option Two: Transfer from the Board of Education and DCPS to the SEO the authority and responsibility for establishing licensing procedures and standards for instructional staff. Retain local licensing functions at DCPS, and transfer state-level licensing to the SEO.

Discussion: The state-level policy role transfers from the Board of Education to the SEO with counsel of a small advisory board with relevant expertise. DCPS retains the licensing function for local hires, and the SEO handles the licensing function for non-DCPS hires.

Advantages:

- Relieves the Board of Education and DCPS of the state-level administrative burden of establishing licensing procedures and standards.
- Provides equitable service delivery to all customers from DCPS, public charter, and private schools.

Disadvantages:

- Places a local administrative burden on the State Education Office.
- Duplicates the licensing function at state and local levels.
- Does not alleviate the DCPS administrative burden of licensure operations.

Option Three: Transfer from the Board of Education and DCPS to the SEO the authority and responsibility for establishing licensing procedures and standards for instructional staff. Transfer operational aspects of licensing from DCPS to the SEO.

Discussion: The LEA Educational Specialist, two certification analysts, and one support staff remain at DCPS to handle local aspects of certification. These certification analysts provide support to the Board of Education and DCPS in developing qualitative criteria for DCPS hire, recruitment and retention efforts, monitoring licensure status of local staff, lending support and advice to principals and managers concerning staff personnel issues, and any other local functions deemed appropriate.

The Director, SEA Educational Specialist, and three support staff transfer from DCPS to the SEO. Five staff members transfer to the SEO, and four remain at DCPS. Responsibility for establishing licensing procedures and standards transfers from the Board of Education and DCPS to the SEO. The SEO develops a small advisory board to assist in developing innovative policy and practice. All state-level operational aspects of licensing transfer from DCPS to the SEO.

Advantages:

- Relieves the Board of Education and DCPS of state-level aspects of licensing.
- Provides equitable service delivery to all customers from DCPS, public charter, and private schools.

- Is consistent with practices in other states that separate state and local functions.
- Commissions an advisory board with broad representation and expertise to be involved in defining licensing procedures and standards.
- Allows DCPS the flexibility to develop local qualitative criteria for new hires.
- Creates an opportunity for development of innovative policy and practice, streamlining of business processes, and technology improvement.

Disadvantage:

- DCPS would not have direct responsibility for establishing licensing procedures and standards that are required of their instructional staff.

D. Recommendation and Rationale

Recommendation

The SEO recommends Option 3: Transfer from the Board of Education and DCPS to the SEO the authority and responsibility for establishing licensing procedures and standards for instructional staff. Transfer operational aspects of licensing from DCPS to the SEO. An advisory board with broad representation and expertise would assist the SEO in defining licensing procedures and standards.

Rationale

This recommendation resulted from consideration of input from stakeholders and study of practices in other states. The recommendation seeks to house the responsibility for state licensure at the state level, as in other states. Additional consideration was given to the fact that these services affect customers from public, public charter, and private schools. Also factoring into the decision were stakeholders' comments indicating their position that enhanced visibility of the function (by placing the responsibility for state level functions within the SEO) could result in policy and practice improvement. Additionally, transfer of the state-level responsibility associated with this function would allow DCPS and the Board of Education to focus on local duties.

E. Application of Decision Criteria

1. Consistency With the Vision and Mission of the SEO

The transfer of state responsibilities associated with licensing procedures and standards is consistent with the mission of the SEO to enhance the administrative efficiency of state-level functions. Plans for efficiency improvement might include technology that could

better service prospective and existing licensure candidates, similar to that mentioned in the Maryland practice section. The transfer would also enhance the equitability of service delivery for those candidates seeking certification from non-DCPS educational settings.

2. Effect on the Transferring Agency

The transfer enhances the ability of the Board of Education and the Superintendent of D.C. Public Schools to effectively carry out local responsibilities.

3. Effect on the Quality of Educational and Other Services to Children and Adults

The separation of state and local duties might allow the SEO to dedicate more attention to defining licensing procedures and standards that would attract, retain, and develop quality educators in the District of Columbia. Alleviating DCPS of the operational duties would allow focus on local aspects of recruitment and retention.

4. Potential for Duplication of Functions

The legislation designating the Board of Education and the Superintendent of D.C. Public Schools responsible for establishing licensing procedures and standards for instructional staff would need to be modified to transfer authority to the SEO. Assignment of state and local duties would need further clarification to avoid duplication of efforts on the part of the Board of Education, DCPS, and the SEO.

5. Effect on Reporting Requirements

DCPS would submit local licensure status information to the SEO for compilation of District-wide data on educational personnel. This would not alter existing DCPS reporting practices for schools under DCPS administration, but would eliminate any non-DCPS reporting previously conducted.

6. Potential for Conflict of Interest

To avoid conflicts of interest, the SEO should focus on developing licensing procedures and standards that aim at establishing a minimum threshold for a District of Columbia license to teach, administer, and provide educational services. This could provide all customers, both DCPS and non-DCPS, an opportunity to use the certification and licensure process as a minimum screening mechanism, allowing DCPS, public charter, and private schools the flexibility to develop their own qualitative criteria for local hire.

7. Effect on Cost

There should be no significant increase or decrease of costs to the District of Columbia effected by the transfer. Business process improvement might yield increased initial costs, but fixed operating costs should remain similar to actual levels. Current staffing levels would be maintained to administer state-level functions. DCPS would be able to

utilize the four remaining positions to support its human resource activities. Upon transfer, the SEO could lend existing staff support to this function area until operations were more streamlined, and the advisory board developed.

Initial costs would include workstations for transferred employees. Subsequent costs would include operating expenses associated with the advisory board and technology improvement. This advisory body would incur minimal costs for meeting space and transportation, but would not include salary for members. Office of the Chief Technology Officer staff should conduct a proper business process and technology assessment before estimating costs of improvement.

F. Transition Plan for Assumption of the Function

1. Authority and Responsibility of Each Party at Each Stage of the Transition

Proper planning is crucial to a successful transition. Transfer of this function is projected for FY 2003, and planning would need to occur during the year prior to transfer. The SEO would convene a transition working group, with representation of the Board of Education, DCPS administrators, and SEO senior staff, to develop a detailed transition plan for addressing issues of legislation, budget, operations, and personnel. The SEO would facilitate the series of meetings and coordinate tasks that would result. The SEO would take responsibility for managing the transition process.

2. Dates and Benchmarks for Assumption of Authority, Responsibility, Budget, and Employees

If the function is authorized:

Responsibility	Benchmark Tasks	Date
Legislative Authority	Legislation reviewed and amended to reflect new SEO authority.	Review prior to transfer date. If transfer date is FY 2003, review should occur in FY 2002. Authority transferred for beginning of FY 2003.
Budget Authority	Budget authority should coincide with transfer of legislative authority and operations.	Recommended date beginning of FY 2003 to coincide with operations transfer. FY 2003 budget formulation process should factor this transfer.
Operations	Assessment and preparation for transfer of certification and licensure files.	Assess and prepare during FY 2002 for the transfer in the beginning of FY 2003.
Personnel	Preparation for transfer of DCPS personnel from DCPS system to that of D.C. government. Tasks will include re-classification of positions.	Prepare personnel packet for D.C. Personnel in FY 2002 for actions to take effect upon transfer in the beginning of FY 2003.

3. Estimated Cost to the SEO for Assumption and Management of Function and Recommended Source(s) of Revenue

DCPS budgetary resources dedicated for personal and non-personal costs associated with the state-level functions would be transferred from the DCPS operating budget to that of the SEO. These costs are the following:

Personal Services (salary and benefits)

These figures are based on the Educational Credentialing and Standards Branch FY2001 budget submittal. They do not include any promotions that might have been contemplated by DCPS.

Director	\$81,875
SEA Ed Specialist	\$47,263
Central Office Clerk	\$24,152
Receptionist	\$24,152
Secretary	\$32,892
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Total	\$210,334

Non- Personal Services

The first three figures are estimates based on a 56% rate of the FY 2001 budget submittal figures for those categories. The presumption is that furniture and equipment would not be transferred with staff; the cost of this would need more detailed calculation. Telecommunications and rent would need to be added, as well as the costs of any business process/technology improvements following an assessment. The cost of the transfer of electronic and paper files would need to be added, once calculated.

Supplies & Materials	\$ 5,600
Other Services & Charges	480
Contracts	2,800
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Total	\$ 8,880 +

Other Cost Considerations:

Furniture and equipment	\$5,000 per employee (rough estimate)
Telecommunications	TBD
Rent	TBD
Business Process Re-engineering/ Technology	TBD

Sources of revenue:

DCPS collected \$81,500 in licensure fee revenue in FY2000. A decision about the collection and administration of these funds would need to be made before transfer. The recommendation is that licensing fees be collected and administered by the SEO as part of its state-level duties. Expenditure of funds should include local as well as state activities, especially in terms of recruitment and retention efforts for DCPS.

4. Factors With Potential for Disrupting Services to Students and Recommended Steps to Prevent Disruption

A risk for disruption of services to students occurs if the transition is improperly timed at the beginning or end of the academic year when certification and licensure actions peak, or when a teacher education program accreditation review is due. To allow for adequate planning, the recommendation is to plan the transition for the beginning of fiscal year 2003 (October 1) after the academic year has begun.